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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF CHRISTOPHER V.
COTTON IN SUPPORT OF DEFENDANTS'
OPPOSITION TO MOTION TO
WITHDRAW AS COUNSEL OF RECORD**

This Document Relates to:

*Jane Doe KGDB 016 v. Uber
Technologies, Inc., et al.*, Case No. 3:25-
cv-04337

Judge: Honorable Charles R. Breyer

DECLARATION OF CHRISTOPHER V. COTTON

I, Christopher V. Cotton, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Kansas City, Missouri. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Defendants”) opposition to Kherkher Garcia LLP’s (“Kherkher Garcia”) motion to withdraw as counsel for Plaintiff Jane Doe KGDB 016.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Defendants in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of Iowa, the Bar of the State of Missouri, and the Bar of the State of Wisconsin. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On behalf of Plaintiff Jane Doe KGDB 016, Kherkher Garcia submitted a Plaintiff Fact Sheet (PFS) on June 20, 2025, but failed to submit an accompanying verification to the PFS.

4. On July 28, 2025, counsel for Uber communicated to Kherkher Garcia via a PFS Deficiency Notice that Plaintiff Jane Doe KGDB 016’s PFS was deficient for lack of verification.

5. On August 27, 2025, Kherkher Garcia served an Amended Plaintiff Fact Sheet on behalf of Plaintiff Jane Doe KGDB 016, again without a verification.

6. On December 3, 2025, counsel for Uber emailed Kherkher Garcia to provide notice pursuant to Amended PTO 10, Section 9(b), that Plaintiff Jane Doe KGDB 016’s most recent PFS was materially deficient due to Plaintiff’s failure to serve a verification, and to request a meet and confer by Friday, December 5, 2025.

7. On December 5, 2025 at approximately 1:30 PM Pacific, I met and conferred with counsel from Kherkher Garcia, who stated that the firm intended to withdraw as counsel for Plaintiff Jane Doe KGDB 016 in this case. I stated that Uber would oppose the motion to withdraw.

1 I declare under penalty of perjury under the laws of the State of Missouri that the foregoing is
2 true and correct. Executed on December 19, 2025, in Kansas City, Missouri.

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4 **SHOOK, HARDY & BACON L.L.P.**

5 /s/ Christopher V. Cotton

6 CHRISTOPHER V. COTTON

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